

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

Case No.: 1:23-cv-00480-CCE-LPA

PLANNED PARENTHOOD SOUTH)	
ATLANTIC, et al.)	
)	
Plaintiffs,)	RESPONSE OF DA
)	DEFENDANTS TO
v.)	PLAINTIFF’S AMENDED
)	MOTION FOR PRELIMINARY
STEIN, et al.)	INJUNCTION
)	
Defendants.)	

NOW COME Defendants Todd M. Williams, District Attorney for the 40th Prosecutorial District, Spencer Merriweather, III, District Attorney for the 26th Prosecutorial District, Avery Michelle Crump, District Attorney for the 24th Prosecutorial District, Jeff Nieman, District Attorney for the 18th Prosecutorial District, Satana Deberry, District Attorney for the 16th Prosecutorial District, William West, District Attorney for the 14th Prosecutorial District, Lorrin Freeman, District Attorney for the 10th Prosecutorial District, and Benjamin R. David, District Attorney for the 6th Prosecutorial District (hereinafter “DA Defendants¹”), and hereby submit this response to Plaintiffs’ Amended Motion for Preliminary Injunction. [DE 48]

¹ Undersigned counsel does not represent Defendant District Attorney Jim O’Neill. The term “DA Defendants” does not include DA O’Neill.

DA Defendants take no position on Plaintiffs' Amended Motion for Preliminary Injunction. DA Defendants further defer to Intervenor-Defendants to provide any appropriate defense to the challenged statutes and/or statutory amendments enacted by the North Carolina General Assembly.

Submitted, this the 31st day of July, 2023.

JOSHUA H. STEIN
Attorney General

/s/Elizabeth Curran O'Brien
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Merriweather, Crump, Nieman, Deberry,
West, Freeman and David*

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day electronically filed the foregoing **RESPONSE OF DA DEFENDANTS TO PLAINTIFF'S AMENDED MOTION FOR PRELIMINARY INJUNCTION** using the CM/ECF system, which will send notification of such filing to all the counsel of record for the parties who participate in the CM/ECF system.

This the 31st day of July, 2023.

/s/ Elizabeth Curran O'Brien
Elizabeth Curran O'Brien
Special Deputy Attorney General
N.C. Department of Justice